

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

C.M., et al.,

*Plaintiffs,*

v.

**Kristi Noem**, Secretary of the United States Department  
of Homeland Security, in her official capacity, et al.,

*Defendants.*

Case No: 1:25-cv-23182

**DECLARATION OF DANIEL B. TILLEY IN SUPPORT OF  
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

My name is Daniel B. Tilley. I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, pursuant to 28 U.S.C. § 1746, I declare:

1. I am the Legal Director of American Civil Liberties Union Foundation of Florida ("ACLU-FL"). I am counsel of record for Plaintiffs in this case.

2. I graduated from the University of Georgia School of Law and am a member in good standing of the Florida Bar and New York Bar. I am admitted in the Southern, Middle, and Northern Districts of Florida, the U.S. Court of Appeals for the Eleventh Circuit, the U.S. Court of Appeals for the Armed Forces, and the Supreme Court of the United States.

3. I submit this declaration in support of Plaintiffs' Motion for Class Certification and to seek the appointment of ACLU-FL to serve as co-counsel for the proposed class along with counsel from the American Civil Liberties Union Foundation ("ACLU") and Americans for Immigrant Justice ("AIJ"). Counsel at ACLU and AIJ will submit separate declarations in support of their requests to serve as class counsel.

4. My qualifications to serve as class counsel include more than twelve years with the

ACLU-FL where I initially worked as a staff attorney until I was promoted to Legal Director, a role where I now oversee legal teams working on a wide range of civil liberties issues and litigation. I previously was a clerk for two years with the Honorable U.S. Magistrate Judge Alan J. Baverman of the U.S. District Court for the Northern District of Georgia and for one year and three months with the Honorable Judge Margaret A. Ryan of the U.S. Court of Appeals for the Armed Forces.

5. Over the course of my career, I have represented numerous persons in government custody to assert a variety of legal claims and defenses. *E.g.*, *State v. Rodgers*, No. SC17-1050 (Fla.); *Keohane v. Jones*, 4:16-cv-511 (N.D. Fla.); *Hood v. Dep't of Children & Fams.*, No. 16-11204 (11th Cir.) (serving as amicus); *Naber v. Jones*, 2:15-cv-14427 (S.D. Fla.); *Serrabi v. United States*, 3:24-cv-1212 (M.D. Fla.); *Glaze v. Wells*, No. 2021-CA-1369 (Fla. 12th Cir. Ct.); *Barnett v. Tony*, No. 0:20-cv-61113 (S.D. Fla.) (serving as class counsel); *Higgins v. Inch*, No. 4:19-cv-308 (N.D. Fla.).

6. I have also litigated several challenges to state and local laws or practices concerning immigration. *See, e.g.*, *Yin v. Diaz*, 1:24-cv-21129 (S.D. Fla.) (challenging ban on academic employment for certain international students from listed “countries of concern”); *Shen v. Simpson*, 4:23-cv-208 (N.D. Fla.) (challenging ban on ownership and purchase of certain real property in Florida for certain individuals from listed “countries of concern”); *FWAF v. Uthmeier*, 1:23-cv-22655-RAR (S.D. Fla.) (challenging Florida’s Senate Bill 1718, Section 10 criminalizing the transportation of certain immigrants into the state); *ACLU of Florida v. Rhoden*, 3:22-cv-01044 (M.D. Fla.) (challenging an ICE detention center’s lack of access to counsel); *ACLU of Florida v. USCIS*, 1:24-cv-24919 (S.D. Fla.) (challenging USCIS’s failure to timely respond to a FOIA request); *Brown v. Ramsay*, 4:18-cv-10279 (S.D. Fla.) (challenging a county’s employment of an

ICE detainer against a U.S. citizen); *FLIC v. Uthmeier*, 1:25-cv-21524-KMW (S.D. Fla.) (challenging Florida's Senate Bill SB 4C Sections 3 and 4 criminalizing the entry and re-entry of certain immigrants into the state).

7. I will be assisted in this matter by ACLU-FL staff attorney Amy Godshall. Ms. Godshall is a graduate of Cornell Law School and a member in good standing of the Florida bar, and is admitted to practice in the Northern, Middle, and Southern Districts of Florida, and the Eleventh Circuit Court of Appeals. She has worked on a number of the cases set forth in Paragraph 6, *supra*.

8. The ACLU-FL, founded in 1965 as a state affiliate of the ACLU, is a statewide, nonprofit, nonpartisan organization. Its mission is to protect, defend, strengthen, and promote the constitutional rights and liberties of all people in Florida.

9. ACLU-FL has dedicated and will continue to dedicate substantial time and resources to the representation of the Plaintiffs and all putative class members.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Daniel B. Tilley  
Daniel B. Tilley

Executed on July 16, 2025.